

ATTACHMENT B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

Hon. George Caram Steeh
Case No.: 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

MILLER COHEN, P.L.C.
Keith D. Flynn (P74192)
Attorney for Plaintiff
600 W. Lafayette Blvd., 4th Floor
Detroit, MI 48226
313-964-4454
kflynn@millercohen.com

VARNUM LLP
Terrence J. Miglio (P30541)
Barbara E. Buchanan (P55084)
Attorneys for Defendant
39500 High Pointe Blvd., Ste. 350
Novi, MI 48375
248-567-7828
tjmiglio@varnumlaw.com
bebuchanan@varnumlaw.com

DECLARATION OF FIONA BORK

I Fiona Bork, hereby testify and declare that as follows:

1. I am an adult over the age of 18 years.
2. I verify that the facts set forth in this Declaration are true.
3. If sworn as a witness, I can testify with personal knowledge as to the facts set forth in this Declaration.

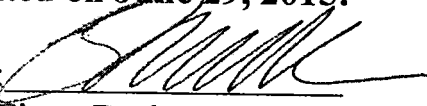
4. I am currently employed by Henry Ford Health System as Laboratory Sales Manager, Henry Ford Medical Laboratories. I have held this position since July 2009.
5. I was the supervisor of Natalie Reeser who reported directly to me.
6. During Ms. Reeser's employment I would call her on her work cell phone (248-721-7099) her personal cell phone (586-843-6020), or at the phone for the Clinton Township Patient Service Center ("CTPSC") (586-228-2774).
7. I have only called Ms. Reeser using my work cell phone number (248-372-1300), my personal cell phone number (313-908-3908), or if I was visiting one of the laboratory work sites, I might use one of those land lines: Shelby Township (586-323-5451) or (586-323-4810) CTPSC (586-228-2774). I have not called her from any other phone number other than the above numbers.
8. I have reviewed Ms. Reeser's deposition and can state that I have never called her at home and threatened her as she testified in her deposition. I never called her at all in late January or February after business hours.
9. On February 25, 2014, I was at "Henry's Café" in the Henry Ford West Bloomfield Hospital until I left to go to CTPSC after learning that Ms. Reeser left that site without authorization. I made no calls to Ms. Reeser

from any phone before I learned that she had left the site without authorization.

10. Contrary to Ms. Reeser's deposition testimony, I have never threatened her in any way or told her she would "be sorry" for going to the state or HR. No such statements were made by me to her at any time.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on June 29, 2015:

By:


Fiona Bork